

Modern Slavery Statement

WHITTENS GROUP **FY2026**



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Introduction

In accordance with the *Modern Slavery Act 2018* (Cth) (“Act”) this statement outlines the steps taken to recognise, measure and address risks of modern slavery in Whittens Group Pty Ltd’s business operations and supply chain, including governance processes for the financial year ending 30 June 2026. Any reference to a ‘period’ or ‘year’ refers to the financial year ending 30 June 2026 unless otherwise specified.

With reference to the Act, Whittens acknowledges that modern slavery includes abuses of human rights, servitude, forced marriage, debt bondage, child and forced labour, slavery, and labour or services procured through deceptive and abusive means.

Whittens Commitment

Whittens is committed to:

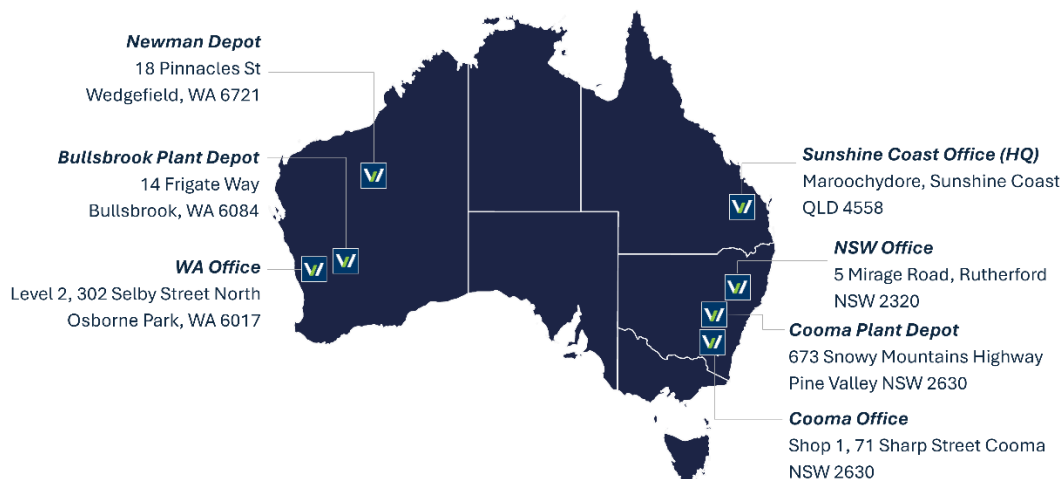
- Ensuring all staff and subcontractors understand modern slavery, and the increased risk within industries Whittens engages, including construction;
- Ensuring compliance with the Act and any amendments to its operations;
- Ensuring due diligence of all suppliers and subcontractors within its systems; and
- Ensuring that where possible, potential or actual instances of modern slavery are both reported and eliminated.



Structure, Scope of Operations, and Supply Chain

STRUCTURE

Whittens Group Pty Ltd (ABN: 21 159 874 085), comprised of wholly owned subsidiaries Whittens Pty Limited (ABN: 52 132 968 800) and Whittens Plant Hire Pty Ltd (ABN: 51 140 415 023) (collectively “Whittens”) is a family-owned Australian civil contracting company established in 2001, specialising in delivering earthworks and concrete solutions for complex infrastructure projects across Australia, with its head office located at Level 2, 302 Selby St North, Osborne Park, Western Australia, 6017, Australia.



SCOPE OF OPERATIONS

Whittens has over two decades of experience delivering safe, reliable, and high-quality civil construction solutions across metropolitan, regional, and remote locations throughout Australia. The company operates across a broad range of project environments, including highly regulated and logistically challenging sites.

Core capabilities include bulk and detailed earthworks, as well as formwork, reinforcement, and concrete works. These services are underpinned by ISO-certified management systems for safety, quality, and environmental performance, supported by robust quality assurance and integrated project management processes.

Whittens regularly undertakes works for Tier 1 contractors, joint ventures, and major resource owners. Recent and ongoing projects have been delivered for clients including Rio Tinto, BHP, Fortescue, Future Generation JV, WeBuild, Sedgman, Saipem, and Clough.

With proven experience mobilising skilled personnel, plant, and equipment to remote and complex sites, Whittens consistently ensures compliance with legislative requirements in engaging both personnel and suppliers.

A strong culture and collaborative approach enable Whittens to achieve sustainable outcomes for clients, stakeholders, and the communities in which it operates, upholding ethical practices in all areas of business operations and supply.



SUPPLY CHAIN

Whittens uses a structured, policy-driven process to select consultants and subcontractors. Suppliers, consultants and subcontractors (“Vendors”) must be prequalified and approved through an onboarding process that checks compliance with safety, insurance, financial, and legal requirements, including modern slavery.

Whittens prioritises local participation through a tiered approach, giving preference to:

- Local Aboriginal Businesses (minimum 51% Aboriginal ownership);
- Local businesses in the project region;
- Businesses based in the relevant state or territory; and
- Australian national businesses.

All engagements must comply with Whittens’ ethical and sustainable procurement principles, which include zero tolerance for bribery and corruption, modern slavery, and commitment to upholding human rights. Whittens uses subcontracts with negotiated terms and conditions when engaging with Vendors, and during the period, 100% of Vendor engagements and spend were on terms and conditions that contained requirements for modern slavery.

While Whittens’ direct supply chain is predominantly Australian-based and therefore assessed as lower risk, Whittens acknowledges that its broader supply chain extends globally, which carries an inherently higher potential risk of modern slavery, particularly within construction and associated supply industries. Whittens applies a risk-based approach to assessing modern slavery exposure across its supply chain, including consideration of supplier location, industry sector, nature of goods and services provided, and reliance on outsourced or labour-intensive activities.

Suppliers of goods and services engaged by Whittens are required, through Whittens’ supplier pre-qualification and onboarding processes, to demonstrate awareness of modern slavery risks and compliance with relevant obligations. Whittens continues to engage with its supply chain through ongoing dialogue and review to enhance transparency and to better understand supplier processes, controls and risk mitigation measures aimed at preventing modern slavery within operations and extended supply networks.

Whittens did not interact with any overseas Vendors, and engaged with 402 local Vendors for the period, with a total Vendor spend of almost \$39 million dollars, and 56% of spend was against the top 25 used Vendors. Whittens strategy of working closely with a smaller number of key strategic Vendors continues to provide the opportunity to develop and maintain a clearer view of the entire supply chain of Vendors.

The top categories for spend in the period were:

- Labour hire
- Materials
- Construction subcontractors
- Professional consultants
- Transportation and freight
- Travel

Whittens acknowledges that spend does not denote the likelihood of modern slavery risks arising and remains committed to ensuring high standards of scrutiny when engaging with Vendors, irrespective of spend limits.

Due Diligence

THE WHITTENS WAY

Through awareness, policy and governance, Whittens ensures a focus on identifying, responding to, and preventing modern slavery risks in both operations and its supply chain. A modern slavery framework comprised of the documents specified in the ‘*Governance and Policy Framework*’ section of this statement confirms Whittens’ commitment to monitoring and addressing the risk of modern slavery within operations and supply chain.

Whittens ensure stakeholder engagement in development of all policies and documents that governs how modern slavery is considered within Whittens, and ensuring alignment with the *United Nations Guiding Principles on Business and Human Rights*.

Whittens is committed to promoting and maintaining the highest standards of ethical values, and strongly believes that by ensuring human rights are upheld and honoured, this is one of the key avenues to enshrine its name, principles and values within all business dealings.

GOVERNANCE AND POLICY FRAMEWORK

Whittens directors, executive leadership team and board all play a key role in overseeing the governance, risk and policy requirements and practices within the organisation. To reinforce its commitment, Whittens has a Code of Conduct Policy and a Speak Up program (www.yourcall.com.au/report number: 1300 790 228), which is a confidential and anonymous service for reporting any illegal or unacceptable behaviour, that includes any perceived actions that would fall within modern slavery guidelines. There were no complaints nor reports made for the period, and Whittens remains committed to monitoring any applicable channels for complaints or concerns relating to modern slavery and abuse of human rights.

Throughout the period, all onboarding of employees and Vendors was performed in accordance with Whittens policies and procedures.

Whittens also have responsible procurement practices and company policies that set out expectations of both the Whittens supply chain and operations, and reinforces its zero tolerance to modern slavery of any form.

All employees and Vendors are expected to comply with the below policies and procedures:

- Code of Conduct
- Diversity and Inclusion Policy
- Modern Slavery Policy
- Anti-Bribery and Corruption
- Working Respectfully Policy
- Disclosure [Whistleblower] Policy

- Equal Opportunity Policy
- Corporate Social Responsibility Policy
- Parental Leave Policy
- Disciplinary procedure
- Grievance and Dispute Policy
- Health Policy
- Risk Policy
- Equal Employment Opportunity Policy
- Procurement Policy
- Human Resources and Industrial Relations Policy
- First Nations Engagement Policy
- Recruitment Procedure

Whittens ensures that through application of the risk management framework and consideration by the executive leadership team and the board it is able to identify risks of human rights abuse in both its operations and supply chain.

IDENTIFYING MODERN SLAVERY RISK

OPERATIONS

Whittens' operational governance is overseen by the Chief Executive Officer, Regional Operations Managers, Head of Safety, Head of Health, Safety & Environment, Group Manager - Commercial & Risk, and Chief Financial Officer. Together with the People & Culture function, these leaders are responsible for embedding ethical business practices, legislative compliance and risk management across the organisation, including oversight of modern slavery risks.

Whittens' employment arrangements are designed to meet or exceed all applicable Commonwealth and State employment legislation, including minimum standards relating to wages, hours of work, leave entitlements, superannuation and workplace health and safety. At any given time, Whittens directly employs approximately 500 employees, with employment conditions governed by contracts of employment and, where applicable, modern awards or enterprise agreements. These arrangements promote lawful, transparent and fair employment practices and reduce the risk of labour exploitation within Whittens' direct workforce

Whittens maintains established governance processes to support compliance with employment obligations and foster a workplace where employees are treated fairly, paid correctly and have access to appropriate avenues to raise concerns. Employees are supported by formal grievance procedures, access to the People & Culture team, and an independent Whistleblower Program, reinforcing a culture of transparency, accountability and early reporting of potential concerns.

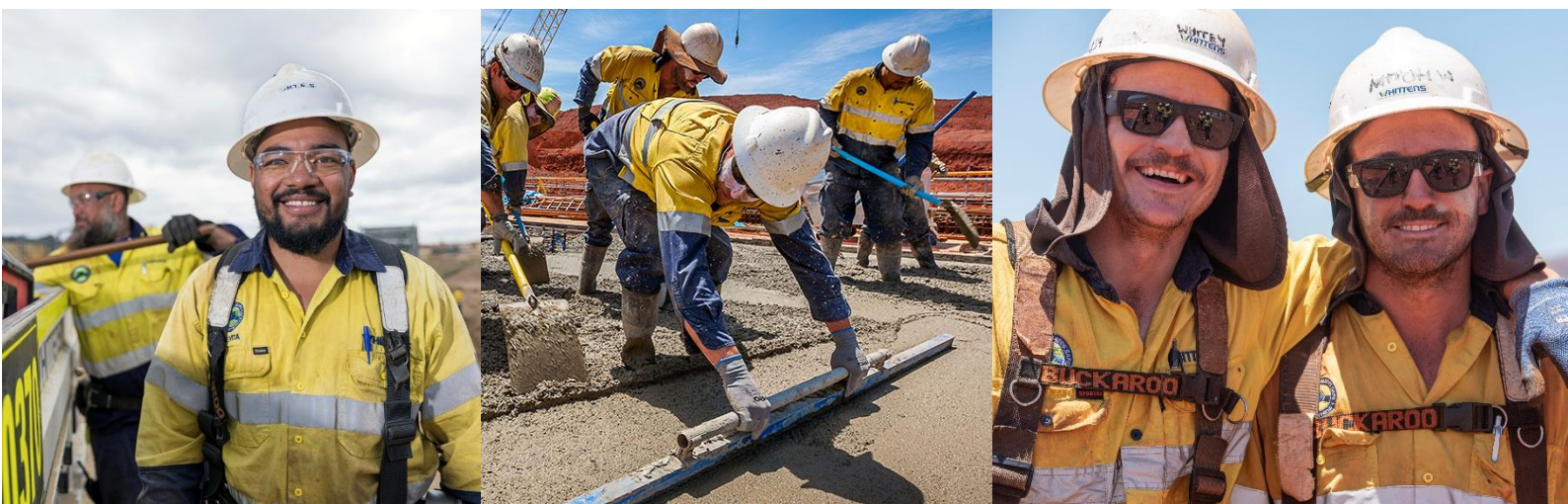
Whittens recognises that modern slavery risks are generally greater within extended supply chains than within its directly employed workforce, particularly where labour hire providers, subcontractors, recruitment agencies or offshore labour sourcing arrangements are utilised. While Whittens undertakes due diligence during the onboarding of vendors, incorporates contractual obligations relating to legal and ethical employment practices, and assesses suppliers against defined procurement requirements, it acknowledges that these controls do not eliminate modern slavery risk.

Accordingly, Whittens adopts a risk-based approach to the engagement and ongoing management of labour hire providers and other higher-risk suppliers. Where labour hire arrangements are utilised, suppliers assessed as presenting a moderate or high inherent risk are subject to enhanced due diligence and monitoring through the Company's procurement

and commercial governance framework, including the maintenance of dedicated supplier risk registers and periodic reviews.

Whittens also seeks to promote awareness of workers' rights across its operations. Information regarding the Company's independent Whistleblower Program and reporting channels is provided during onboarding and displayed throughout offices and project sites, enabling employees, labour hire workers, contractors and other stakeholders to confidentially report suspected underpayments, unethical conduct, labour exploitation or other breaches of workplace standards without fear of reprisal.

Through these governance arrangements, employment practices, procurement controls and reporting mechanisms, Whittens continues to strengthen its ability to identify, assess and mitigate modern slavery risks across both its direct workforce and supply chain.



SUPPLY CHAIN

Whittens continues to engage with its supply chain to enhance its understanding of Vendor processes and controls for the prevention of modern slavery in its supply chain. Risk assessment criteria are applied to Vendors when they are onboarded when it is identified that they would pose a high risk of modern slavery within the supply chain; including spend, industry and geographic location.

Whittens uses the Global Slavery Index (“GSI”) to understand businesses that can be linked to modern slavery (whether directly or indirectly) due to dealings within high-risk industries and geographies; and for the period Whittens confirms it has had no dealings with Vendors who would constitute high risk for either ‘prevalence and number’ or ‘vulnerability’ based on the GSI.

Whittens acknowledges that vendors operating within certain industries may present a heightened risk of labour exploitation and the recruitment of vulnerable workers, including industries involved in the manufacture of personal protective equipment (PPE), of which Whittens is a significant consumer. To mitigate these risks, Whittens prioritises engagement with Australian-owned suppliers and requires suppliers to demonstrate compliance with relevant modern slavery legislation, guidelines and ethical sourcing expectations. These measures support greater transparency in supply chains and reduce the risk of modern slavery practices within Whittens’ procurement activities.

Whittens engages with a wide and diverse range of Vendors, each of whom is assessed against a series of risk factors that together form an overall risk profile. Whittens recognises that certain Vendors may present a heightened risk of modern slavery due to the nature of the industries in which they operate, the inherent vulnerabilities that may exist within their workforce and practices, and the maturity and effectiveness of their internal controls; including their policies, procedures, governance frameworks, and management systems, or a lack thereof.

Certain industries and sectors are more exposed to modern slavery risks as a result of complex global supply chains, reliance on low-skilled or migrant labour, or limited regulatory oversight. Similarly, workforces that include temporary, seasonal, or subcontracted labour can be more susceptible to exploitation if adequate safeguards are not in place. In addition, Vendors with underdeveloped internal controls may lack the necessary mechanisms to

prevent, detect, or respond to potential modern slavery concerns that they may be exposed to.

Whittens is committed to proactively identifying, understanding, and monitoring these risk factors, along with any emerging or contextual risks that may influence a Vendor's overall profile. This approach enables Whittens to address modern slavery risks in a targeted and responsible way, strengthening transparency within its supply chain, and supporting continual improvement across the organisations it partners with.



ASSESSING AND ADDRESSING RISKS

Whittens is committed to the refinement of its framework, policies, and procedures to better understand, assess and manage the effectiveness of actions taken to address modern slavery risks, and recognises this is essential to managing those risks in a structured and systematic manner.

As an enterprise operating across multiple sectors and all of Australia, Whittens recognises the importance of transparent reporting, clearly defined performance measures and a commitment to continuous improvement.

Oversight of modern slavery risk management is supported through appropriate governance arrangements, including senior management review and accountability for the implementation and monitoring of relevant policies, controls and actions, to ensure ongoing effectiveness and responsiveness to emerging risks.

ANNUAL IMPROVEMENT: FY25-26

In FY26, Whittens strengthened its entire procurement and commercial positioning as an organisation, with a focus on governance, legislative compliance, and overall performance enhancement.

Some of the activities undertaken include examples below:

Activity	FY25 Approach	FY26 Improvement
Supplier questionnaire	Ad-hoc application of the questionnaire, with less detailed questions	Improved questionnaire with more detailed criteria and questions, to be undertaken by all Vendors
Vendor contracts	Terms that met a minimum threshold for management of modern slavery risks	Full overhaul and update of all provisions, with an update to the suite to better align with requirements
Procure-to-Pay	Basic and separate processes applied	Fully integrated procure-to-pay procedure and processes ensuring compliance with all requirements

MEASURING EFFECTIVENESS

Whittens continues to focus on the application and improvement of its modern slavery framework, and processes and procedures that underpin the appropriate management. Ensuring effective management is vital to understanding improvements and gaps to better improve modern slavery risks within the business.

Whittens ensures to remain abreast of updates and changes to the requirements under the Act and associated bodies to better understand possible human rights infringements and ensure it maintains suitable safeguards and awareness within the scope of operations.

Whittens monitors and measures the effectiveness of its actions in relation to addressing modern slavery risks through numerous avenues, including the following examples”

- Internal stakeholder consultation
- Increased awareness within the business of modern slavery risks
- Application of the ISO risk framework to assess changes within the business risk profile
- Independent reviews of frameworks governing modern slavery framework parameters

Continuous Improvement & Future Development

Whittens is committed to the continuous improvement of its approach to preventing modern slavery across its operations and business activities. This commitment includes regularly reviewing and strengthening policies, procedures and controls, enhancing awareness and understanding of modern slavery risks, and embedding risk-based practices into decision-making and supplier engagement. Through ongoing monitoring, governance oversight and engagement with stakeholders, Whittens seeks to progressively improve the effectiveness of its measures to identify, assess and mitigate modern slavery risks and to respond appropriately as those risks evolve.

The following actions are planned for FY27;

Activity	Actions	By
Employee training	Targeted training for employees in positions to identify possible instances of modern slavery	End FY27
Whistleblower policy	Refresh and re-educate staff on the whistleblower hotline	End FY27
Supplier supply chain monitoring	Develop further questionnaire to understand sub-supplier locations and likelihood of modern slavery exposure	End FY27

Conclusion

Whittens remains committed to the eradication of any and all forms of modern slavery within its supply chains and operations, and continues to reinforce strategies and actions to identify, mitigate and prevent modern slavery risks.

Whittens demonstrates through the publication of this statement transparency and accountability in its ongoing efforts, and affirms its priorities for the period include ensuring uniformity in all contract engagements, modern slavery training for staff, and increased assessment in Vendor onboarding. Through the implementation of initiatives, Whittens will ensure it further embeds modern slavery risk awareness and management into supply chains and operations respectively.

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and constitutes Whittens slavery statement for the financial year ended 30 June 2026.

This statement was approved by the Directors on 15 07 2026.



Louise Whitten

Chief Executive Officer

July 2026

The Act's requirements for mandatory reporting criteria can be found in the following page locations:

Act Requirement	Section Page
Identify the reporting entity	Introduction 3
Describe the reporting entity's structure, operations and supply chains	Structure, Scope of Operations, Supply Chain 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Due Diligence: Identifying Modern Slavery Risk 7
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Due Diligence: Assessing Risks 9
Describe how the reporting entity assesses the effectiveness of these actions	Due Diligence: Measuring Effectiveness 10
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	All entities are wholly owned by Whittens Group Pty Ltd, therefore not applicable



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